

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JAIME RAMON CASTANEDA
VALENZUELA,

Plaintiff,

v.

CONNIE NOLAN, *et al.*,

Defendants.

Case No. 2:24-cv-01441-RSL

STIPULATED MOTION TO HOLD
CASE IN ABEYANCE AND ORDER

Plaintiff and Defendants, by and through their counsel of record, pursuant to Federal Rule of Civil Procedure 6 and Local Rules 7(d)(1), 10(g) and 16, hereby jointly stipulate and move to stay these proceedings until January 17, 2025. Plaintiff brought this litigation pursuant to the Administrative Procedure Act and Mandamus Act, *inter alia*, to compel U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate his Form I-918 and Form I-765. Defendants’ response to the Complaint is currently due on November 18, 2024. The parties are currently working towards a resolution to this litigation. For good cause, the parties request that the Court hold the case in abeyance until January 17, 2025.

Courts have “broad discretion” to stay proceedings. *Clinton v. Jones*, 520 U.S. 681, 706 (1997). “[T]he power to stay proceedings is incidental to the power inherent in every court to control the disposition of the causes on its docket with economy of time and effort for itself, for

counsel, and for litigants.” *Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936); *see also* Fed. R. Civ. P. 1.

With additional time, this case may be resolved without the need of further judicial intervention. USCIS is in the process of reviewing Plaintiff’s applications. Once the applications are adjudicated, Plaintiff will dismiss the case. As additional time is necessary for this to occur, the parties request that the Court hold the case in abeyance until January 17, 2025. The parties will submit a status update on or before January 17, 2025.

DATED this 18th day of November, 2024.

Respectfully submitted,

TESSA M. GORMAN
United States Attorney

GLOBAL LAW ADVOCATES, PLLC

s/ Michelle R. Lambert
MICHELLE R. LAMBERT, NYS #4666657
Assistant United States Attorney
United States Attorney’s Office
Western District of Washington
1201 Pacific Avenue, Suite 700
Tacoma, Washington 98402
Phone: (253) 428-3824
Fax: (253) 428-3826
Email: michelle.lambert@usdoj.gov

s/ Inna Scott
INNA SCOTT, WSBA #46864
655 South Orcas Street, Ste. 210
Seattle, Washington 98108
Phone: (206) 774-8758
Email: iscott@globallawadvocates.com

Attorney for Plaintiff

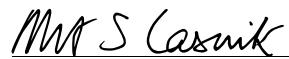
Attorneys for Defendants

I certify that this memorandum contains 250 words, in compliance with the Local Civil Rules.

ORDER

The case is held in abeyance until January 17, 2025. The parties shall submit a status update on or before January 17, 2025. It is so **ORDERED**.

Dated this 19th day of November, 2024.



Robert S. Lasnik
United States District Judge